Evan J. Spelfogel (474440) Epstein Becker & Green, P.C. 250 Park Avenue New York, New York 10177-1211 (212) 351-4500 Attorneys for Defendant UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS ----- X LUANN P. GOULD, : 05 CV 11118 (PBS) Plaintiff, against – LUCENT TECHNOLOGIES, INC., Defendant. ----- x

MOTION FOR LEAVE TO APPEAR PRO HAC VICE

Defendant Lucent Technologies, Inc., by and through its attorneys of record, Evan Spelfogel Esq., Epstein Becker & Green, P.C., hereby moves pursuant to Local Rule 83.5.3(b) for an Order admitting Jamila A. Berridge, Esq. *pro hac vice* for the purpose of appearing and practicing in the above-captioned matter. In support of its Motion, Defendant states as follows:

- 1. Undersigned counsel of record for Defendant in this matter is a member in good standing of the bar of this Court.
- 2. Ms. Berridge is an associate at the law firm of Epstein Becker & Green, P.C., 250 Park Avenue, New York, NY 10177-1211, (212) 351-4692.
- 3. Ms. Berridge is a member in good standing of the Bar of the State of California as well as the United States Court of Appeals for the Ninth Circuit, and the United States District Court for the Northern and Central Districts of California. Ms. Berridge is also a member in

good standing of the Bar of the State of New York, as well as the United States District Court for

the Southern and Eastern Districts of New York.

There are no disciplinary proceedings pending against Ms. Berridge. 4.

5. Ms. Berridge possesses knowledge of relevant issues that will be invaluable in

connection with the representation of the Defendant in this matter. Ms. Berridge will be

assisting me with this matter in the place of Robyn Ruderman, who was previously admitted pro

hac vice in this case and who has recently gone out on maternity leave.

6. Ms. Berridge is familiar with the Local Rules of the United States District Court

for the District of Massachusetts and agrees to abide by the rules and procedures applicable to

attorneys practicing in the District Court of Massachusetts in connection with this litigation.

7. Attached hereto as Exhibit A is the Declaration of Jamila A. Berridge, affirming

the statements made in this Motion.

WHEREFORE, Defendant respectfully requests that the Court grant leave for Jamila A.

Berridge to appear and practice pro hac vice in the above captioned matter.

/s/ Evan J. Spelfogel, Esq.

Evan J. Spelfogel (474440)

EPSTEIN BECKER & GREEN, P.C.

250 Park Avenue

New York, New York 10177-1211

(212) 351-4500

Attorneys for Defendant Lucent Technologies Inc.

Dated: January 18, 2007

2 NY:1549898v1

DISTRICT OF MASSACHUSETTS	
	x
LUANN P. GOULD,	:
Plaintiff,	: 05 CV 11118 (PBS) :
– against –	: DECLARATION OF JAMILA A. : BERRIDGE IN SUPPORT OF
LUCENT TECHNOLOGIES, INC.,	: MOTION FOR LEAVE TO ADMIT
Defendant.	: PRO HAC VICE
	: :
	x

JAMILA A. BERRIDGE declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

- 1. I am an attorney of the law firm Epstein Becker & Green, P.C., attorneys for defendant Lucent Technologies, Inc. ("Lucent"). I make this declaration in support of my petition to be admitted *pro hac vice* as counsel to Lucent, in the above-captioned matter.
- I am domiciled in the State of New York and I practice law in New York
 State.
- 3. I am admitted to practice law in the State Courts of California, as well as the United States Court of Appeals for the Ninth Circuit, and the United States District Courts for the Northern and Central Districts of California. I am also admitted to practice law in the State Courts of New York and the United States District Courts for the Southern and Eastern Districts of New York. I am a member in good standing of all the aforementioned Bars.
- 4. True and correct copies of certificates of good standing from the Appellate Division, First Department of New York and from the Supreme Court of California are attached hereto as Exhibit A.

5. There are no disciplinary proceedings pending against me as a member of

the Bar of any jurisdiction, and I have never been held in contempt of court, censured, suspended

or disbarred.

The New York Bar grants like pro hac vice privileges to members of the 6.

bar of the Commonwealth of Massachusetts.

7. I have become familiar with the standards of professional conduct

imposed upon members of the Massachusetts Bar and relevant statutes, rules and procedures and

will abide by them.

I seek to participate in the above-captioned matter because of my expertise

in the applicable area.

8.

WHEREFORE, I respectfully request that this Court grant leave for me to appear and

practice pro hac vice for all purposes in the above-captioned matter.

/s/ Jamila A. Berridge JAMILA A. BERRIDGE

Dated: New York, New York January 18, 2007

2 NY:1549919v1

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EXHIBIT A

Appellate Division of the Supreme Court of the State of New York First Judicial Bepartment

I, Catherine D'Hagan Molfe, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

JAMILA A. BERRIDGE

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on the 7th day of Decembr, 2004 has duly taken and subscribed the vath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Mitness Mhereof, I have hereunto set my hand and affixed the seal of this court on Ianuary 8, 2007





Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

JAMILA AYANA BERRIDGE

I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that JAMILA AYANA BERRIDGE was on the 4TH day of DECEMBER 2000, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that her name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.

Witness my hand and the seal of the court, this 9th day of JANUARY, 2007.

FREDERICK K. OHLRICH

Clerk of the Supreme Court

By Soseph Cornetta, Deputy Clerk

Evan J. Spelfogel (474440) Epstein Becker & Green, P.C. 250 Park Avenue New York, New York 10177-1211 (212) 351-4500 Attorneys for Defendant

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

LUANN P. GOULD, : (PBS)

____X

Plaintiff,

: 05 CV 11118 (PBS)

– against –

LUCENT TECHNOLOGIES, INC.,

: PROPOSED ORDER FOR PRO
: HAC VICE ADMISSION OF

Defendant. : JAMILA A. BERRIDGE

; -----**x**

Upon motion before this Court, pursuant to 83.5.3(b) of the Local Rules Governing the Admission and Practice of Attorneys, the admission *pro hac vice* of Jamila A. Berridge, in the captioned matter is hereby

ORDERED that said Motion is GRANTED.

HONORABLE PATTI B. SARIS U.S. DISTRICT JUDGE

Dated: New York, New York January 18, 2007

DISTRICT OF MASSACHUSETTS	,
LUANN P. GOULD,	-
Plaintiff,	05 CV 11118 (PBS)
– against –	CERTIFICATE OF SERVICE
LUCENT TECHNOLOGIES, INC.,	
Defendant. :	•
; ;	
	(

Jamila A. Berridge hereby certifies that:

I am not a party to this action, am over 18 years old and am employed by Epstein

Becker & Green, P.C., 250 Park Avenue, New York, New York. On January 18, 2007, I served

true copies of the attached Motion for Leave to Appear Pro Hac Vice, Declaration of Jamila

A. Berridge in Support of Motion for Leave to Admit Pro Hac Vice, and Order for Pro Hac

Vice Admission of Jamila A. Berridge, by overnight delivery by depositing same in a sealed

envelope, postage prepaid, in a Federal Express depository within the State of New York

addressed to the following person at the address indicated below:

Linda A. Harvey, Esq. Harvey & Kleger 184 Pleasant Valley Street Methuen, MA 01844

> ____/s/ Jamila A. Berridge_____ Jamila A. Berridge